

THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Lead Plaintiff and Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANTHONY PAUWELS, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE
HUANG,

Defendants.

ZHONGXUN YANG, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE
HUANG,

Defendants.

CASE No.: 1:21-cv-00515-ALC

**NOTICE OF MOTION OF ANDRE
JOHNSON TO: (1) CONSOLIDATE
RELATED ACTIONS; (2) APPOINT
LEAD PLAINTIFF; AND (3)
APPROVE LEAD PLAINTIFF'S
SELECTION OF COUNSEL**

CLASS ACTION

ORAL ARGUMENT REQUESTED

CASE No.: 1:21-cv-00721-ALC

CLASS ACTION

[Additional caption below]

JOSEPH FRANKLIN MONKAM NITCHEU,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

BIT DIGITAL, INC., MIN HU, and ERKE
HUANG,

Defendants.

CASE No.: 1:21-cv-02262-ALC

CLASS ACTION

PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Plaintiff Andre Johnson (“Movant”) hereby moves this Court, the Honorable Andrew L. Carter Jr. United States District Court Judge, on a date and at a time to be designated by the Court, for an order:

- (a) consolidating the related actions;
- (b) appointing Movant to serve as Lead Plaintiff in this action; and
- (c) approving Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated March 22, 2021 (and exhibits); and (ii) a [Proposed] Order Consolidating Related Actions, Appointing Lead Plaintiff, and Approving Lead Plaintiff’s Selection of Counsel.

Dated: March 22, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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*[Proposed] Lead Counsel for Lead Plaintiff
and Class*

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Phillip Kim